No. 87472-7

IN THE SUPREME COURT OF WASHINGTON

STATE OF WASHINGTON,
Respondent

v.

TIMOTHY DOBBS,
Petitioner

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR COWLITZ COUNTY

The Honorable Stephen Warning and James Stonier, Judges

SUPPLEMENTAL BRIEF

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page

WASHINGTON CASES

FEDERAL CASES

TABLE OF AUTHORITIES (CONT'D)

TABLE OF AUTHORITIES (CONT'D)

A. ISSUES IN SUPPLEMENTAL BRIEF

1. To justify the claimed forfeiture of confrontation rights, the state must establish a nexus between an accused's alleged wrongdoing and a witness's absence from trial, by clear, cogent, and convincing evidence. Is the evidence insufficient to show a nexus between the complaining witness's absence and any alleged wrongdoing?

2. Should this Court ensure that the "forfeiture by wrongdoing" exception remains an exception, and does not negate confrontation rights in every case where the state alleges domestic violence and the state's witness does not fully cooperate with the state?

3. Should this Court reject the Court of Appeals' analysis that a forfeiture of confrontation rights automatically results in the forfeiture of all independent reliability protections of the evidentiary rules?

B. SUPPLEMENTAL STATEMENT OF THE CASE[1]

The Cowlitz County prosecutor charged petitioner Timothy Dobbs with eight counts arising from incidents involving C.R., the complaining witness.[2] CP 1-4. The trial court found him not guilty of second degree assault and first degree burglary. CP 3; RP 308. But the court found Dobbs guilty of six counts, four of which included "domestic violence" allegations.[3]

As described in more detail in the briefs and petition, C.R. declined to cooperate with Detective Michael Hallowell's follow up investigation. She did not return his calls or meet at his office. Even though the state subpoenaed her, and various officers tried to find her on the day of trial, she did not appear to testify at trial.

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[1] The facts are more fully set forth in the Brief of Appellant (BOA) at 1-9, the Brief of Respondent (BOR) at 1-10, and the Court of Appeals decision. State v. Dobbs, 167 Wn. App. 905, 907-12, 276 P.3d 324, rev. granted, 175 Wn.2d 1013 (2012).

[2] The transcripts and both parties' briefs referred to C.R. by her full name, but Division Two referred to her by initials.

[3] "The trial court convicted Dobbs of [1] stalking – domestic violence with a deadly weapon enhancement; [2] felony harassment – domestic violence; [3] intimidating a witness – domestic violence; [4] drive by shooting – domestic violence; [5] first degree unlawful possession of a firearm; and [6] obstructing a law enforcement officer." Dobbs, 167 Wn. App. at 907 n.1; see also RP 306-10 (court's oral ruling). The court entered no written findings and conclusions.

The state then sought to prove its case by admitting C.R.'s unconfronted testimonial hearsay statements to various responding officers. The state theorized Dobbs had forfeited his confrontation rights by threatening C.R. and committing the offenses. Underlying the state's argument was its assumption that C.R. had declined to testify because Dobbs had successfully intimidated her. RP 248-55.

The defense objected, arguing the state had not proved that C.R.'s absence was due to any fear of Dobbs. She had declined to meet with Hallowell even though Dobbs was in jail. "It sounds like she was just not showing up because she didn't want to be bothered. That's how I would interpret her actions." RP 252-53.

The trial court orally ruled that C.R. was afraid of Dobbs "and that's why she isn't here to testify." RP 256. The court relied on the testimonial statements to find Dobbs guilty of the charged offenses. RP 306-10.[4]

In a published 2-1 opinion, the Division Two majority affirmed, reasoning that the evidence of threats and conduct was "substantial evidence that Dobbs intentionally engaged in misconduct to keep

[4] The state made no harmless error argument in its brief. If this Court determines the trial court erred, the error cannot be harmless under any standard.

C.R. from testifying." Dobbs, 167 Wn. App. at 914. Regarding the nexus between the alleged wrongdoing and C.R.'s absence, the majority offered this terse conclusion: "[t]here is sufficient evidence to show that Dobbs caused C.R.'s unavailability. The trial court did not err in applying the doctrine of forfeiture by wrongdoing." Dobbs, 167 Wn. App. at 915.

In dissent, Judge Van Deren reviewed this record and concluded it lacked clear, cogent and convincing evidence that Dobbs' conduct accomplished C.R.'s absence. Dobbs, at 919-20 (Van Deren, J., dissenting). Nor did the trial court enter factual findings that Dobbs had the specific intent to prevent C.R. from testifying. Id., at 920.

> Although the record is replete with allegations about Dobbs' conduct toward the alleged victim, the record lacks even a scintilla of evidence about why the witness actually chose to not attend trial.

Dobbs, at 920-21 (Van Deren, J., dissenting). When Officer Headley reminded her the night before her scheduled testimony, she did not suggest she would not appear. "The record shows only speculation about her reasons for not appearing in court, based on the pending charges and on a statement Dobbs allegedly made to her after his arrest, and after he made a telephone call from the jail." Id.

This Court granted Dobbs' petition for review.

C. ARGUMENT

1. THE TRIAL COURT'S ADMISSION OF UNCONFRONTED TESTIMONIAL STATEMENTS, AND ITS RELIANCE ON THOSE STATEMENTS, IS REVERSIBLE ERROR UNDER THE SIXTH AMENDMENT AND ARTICLE 1, § 22.

The state and federal constitutions guarantee an accused the right to confront the witnesses who testify against him. U.S. Const. amend. 6; Const. art. 1, § 22; Giles v. California, 554 U.S. 353, 357-58, 128 S. Ct. 2678, 171 L. Ed. 2d 488 (2008); Crawford v. Washington, 541 U.S. 36, 51, 124 S. Ct. 1354, 158 L. Ed. 2d 177 (2004); State v. Mason, 160 Wn.2d 910, 917-18, 162 P.3d 396 (2007). "If a witness is unavailable and there has been no prior opportunity to cross-examine, a testimonial statement must be excluded under the confrontation clause if it is offered for the truth of the matter asserted." State v. Fraser, 170 Wn. App. 13, 23, 282 P.3d 152 (2012) (citing Crawford, 541 U.S. at 59); accord, State v. Jasper 174 Wn.2d 96, 100, 271 P.3d 876 (2012)

Waiver of confrontation rights is not presumed. Instead, "[t]here is a presumption against the waiver of constitutional rights, and for a waiver to be effective it must be clearly established that there was an intentional relinquishment or abandonment of a known

right or privilege." Brookhart v. Janis, 384 U.S. 1, 4, 86 S. Ct. 1245, 16 L. Ed. 2d 314 (1966) (citing, inter alia, Johnson v. Zerbst, 304 U.S. 458, 464, 58 S. Ct. 1019, 82 L. Ed. 1461 (1938)).

a. The State Must Prove the Alleged Wrongdoing Was Intended to, and Did, Cause the Witness' Absence.

After Giles and Mason, it is clear the state must show the accused's wrongful acts were intended to prevent the witness's testimony, and that the wrongdoing rendered the witness unavailable. Proof of wrongdoing is not enough; the state must also prove a nexus between the wrongdoing and the witness' absence. State v. Fallentine, 149 Wn. App. 614, 620-21, 215 P.3d 945, rev. denied, 166 Wn.2d 1028 (2009); Mason, 160 Wn.2d at 927.

As argued in the petition for review and brief of appellant, a witness might decline to testify for many reasons. PRV at 1-2; BOA at 14, 19. For example, the defendant could be innocent, and the initial accusation erroneous or knowingly false.[5] A state's witness might

[5] See generally, Rebecca Talbott, What Remains of the "Forfeited" Right to Confrontation? Restoring Sixth Amendment Values to the Forfeiture–by–Wrongdoing Rule in Light of Crawford v. Washington and Giles v. California, 85 N.Y.U. L.Rev. 1291, 1291-93 (2010); D. Michael Risinger & Lesley C. Risinger, Innocence is Different: Taking Innocence into Account in Reforming Criminal Procedure, 56 N.Y.L. Sch. L. Rev. 869 (2011-12).

fear testifying for a reason that cannot be attributed to a defendant's wrongdoing.[6] Prosecutors and police have substantial experience and tactics to deal with witness non-cooperation; it is not a new phenomenon.[7] Given these systemic realities, forfeiture of confrontation rights cannot be an equitable remedy unless the state first shows the accused's wrongdoing caused the witness's absence.

Existing law supports this basic logic. In Mason, the state argued "Mason forfeited his confrontation rights by causing the witness to be unavailable in the first place." Mason, 160 Wn.2d at 924. This Court agreed, reasoning "we will not allow Mason to complain that he was unable to confront Santoso when Mason bears responsibility for Santoso's unavailability." Mason, 160 Wn.2d at 925.

In Giles, the majority discussed the historic basis for the doctrine of forfeiture by wrongdoing. Early cases arose from situations where "a witness was 'detained' or 'kept away' by the

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[6] Sleeter, Adam, Injecting Fairness Into the Doctrine of Forfeiture by Wrongdoing, 83 Wash. U. L.Q. 1367–1395 (2005); Lisa I. Karsai, In Fear for Her Life: How Applying the Forfeiture by Wrongdoing Doctrine to Shield Witness Identities Could Leave Endangered Witnesses Out in the Cold, 19 Va. J. Soc. Pol'y & L. 450, 481-86 (2012).

[7] Donald A. Dripps, Controlling the Damage Done by Crawford v. Washington: Three Constructive Proposals, 7 Ohio St. J. Crim. L. 521, 522 & n.1 (2010).

'means or procurement' of the defendant." Giles, 554 U.S. at 359. At minimum, the Giles majority recognized a defendant's actions must have actually "caused the witness's absence[.]" Id., at 360.

For these reasons, the Court of Appeals correctly stated "the State must prove the causal link between the defendant's conduct and the witness' absence by clear, cogent, and convincing evidence." Dobbs, 167 Wn. App. at 912-13 (citing Mason). The Court of Appeals majority erred, however, in concluding this record held such evidence.

b. The State Bears the Burdens of Production and Proof, to Show the Nexus by Clear, Cogent, and Convincing Evidence.

The state properly concedes this is a factual issue that must be considered as part of "a highly specific, case-by-case determination." ANS, at 13. The state nonetheless refuses to accept the burdens of production and proof, and instead implicitly asks this Court to shift those burdens to the defense. In Mason, this Court declined the state's more explicit invitation, and should do so again.

Because courts do not presume the waiver of constitutional rights, the analysis starts with the presumption that an accused's alleged wrongdoing did not cause the witness's unavailability. The state bears the burden to rebut this presumption with clear, cogent, and convincing proof. Mason, 160 Wn.2d at 926-27. This standard

requires the state to establish the asserted fact to be "highly probable." Merriman v. Cokeley, 168 Wn.2d 627, 630-31, 230 P.3d 162 (2010); In re Welfare of Sego, 82 Wn.2d 736, 739, 513 P.2d 831 (1973). The evidence here fails to meet the requisite standard.

c. There is no Clear, Cogent and Convincing Evidence of a Nexus Between Dobbs' Alleged Conduct and C.R.'s Absence.

The state bore two different burdens in the trial court: (1) to prove that alleged wrongdoing caused C.R.'s unavailability and (2) to prove the elements of the charged offenses. The state, trial court, and Court of Appeals majority improperly merged the two. Dobbs did not challenge the state's overall elemental proof, because if the testimonial hearsay is admitted, the evidence is sufficient. But that analysis is of little help or relevance to the foundational question, i.e., whether the evidence should have been admitted at all.

On the foundational question, the state offered evidence to show C.R. was threatened. There were, as the majority noted, "repeated and persistent acts of violence against C.R. and that [the] violence escalated as time progressed." Dobbs, 167 Wn. App., at 914. Those acts, of course, led to the charges. But the majority overlooked the absence of any proof that the alleged violence was related to C.R.'s absence from trial.

The state had numerous opportunities to both seek and present such proof. C.R. had multiple contacts with various Longview police officers. Officer Headley responded to her initial call on November 7. While Headley was there C.R. answered a call she said was from Dobbs. Headley said the caller ended the call saying, "I warned you not to call the police" and C.R. was "going to get it." She said she feared Dobbs. RP 94-97.

Officer Woodard contacted C.R. three times. He responded to her first and second calls on November 10. Again, she said she feared Dobbs, and implored the police to find him, or else they might find her dead. RP 116. After Dobbs was arrested on November 10, Woodard returned to get C.R.'s statement. RP 128.

Woodard returned to C.R.'s apartment one day later, where he spoke with her again. She said Dobbs had left two voicemails on her phone the previous day: one before his arrest, one after. Woodard described the first one as alluding to gunshots fired earlier in the day. RP 123-24. Woodard described the second as a call from jail,

> essentially pleading with her to not go forward and not to press charges against him and it – it kind of quickly turned into kind of a threatening of don't do this to me or – you'll regret it.

RP 123. Woodard asked C.R. not to delete the voicemails, and to share them with the detective. RP 127.

Dobbs was in custody from November 10 through trial. The second voicemail was the only post-arrest conduct the state proved.

Detective Hallowell searched for a gun in the area of C.R.'s apartment the morning of November 11. RP 134-35. Hallowell admitted he had multiple conversations with C.R. after the initial incidents, but she did not show up for three appointments at his office. She never returned his calls. RP 241.

During a pretrial hearing on January 12, 2010, both counsel noted C.R. had not been cooperating with defense interview requests. The state had not yet served her with a subpoena. RP 7. Defense counsel said "there are a number of indications in the police report that she is unwilling to cooperate so I would seriously doubt they have even served her at this point." RP 7-8.

Trial was held January 25-26, 2010. RP 17, 196. On January 25, the prosecutor said C.R. was served with a subpoena January 12, which required her presence at 10:30 a.m. on January 25. Officer Headley contacted her the night of the 24th, advising her to be present at 9 a.m. the next day. When she did not appear at 9 a.m., the

prosecutor asked for a material witness warrant. The court said it would wait until 10:30 to see if she appeared. RP 18-19, 77-78.

At about 10:50 a.m., the prosecutor renewed the request and the court said it would issue a no-bail warrant requiring C.R. to be brought to court. RP 77-78, 86. After lunch, at 1:11 p.m., the prosecutor said detectives "have leads but they have not yet [located her], Your Honor." RP 86. The court then signed the warrant at the prosecutor's request. RP 86-87.

During testimony on January 26, the prosecutor asked Detective Hallowell what efforts were taken to detain C.R. under the warrant. Hallowell said three officers responded to her apartment but she was not there. RP 238. He had briefed the swing shift sergeant and the graveyard shift officer. He checked a few other places in town where he thought she might be. RP 239. Hallowell said the swing shift officer (Headley) was unsuccessful in finding C.R. at the residence at 10:45 the night before. RP 240. Hallowell said he checked C.R.'s apartment at 8 that morning. He noted the door knob was broken, but he opened the door, called to anyone who might be inside, and received no response. RP 240.

The state also presented testimony from James Applebury and Sarah Ellis, C.R.'s landlord and neighbors. Although both offered

testimony to support the charges, neither offered any evidence to explain why C.R. declined to appear. RP 34-78.

In short, the evidence showed officers contacted C.R. multiple times in early November responding to calls during the alleged events. They contacted her several times after the event on November 10. They served her with a subpoena on January 12. Headley spoke with her the night before the start of trial. Civilian witnesses lived next to C.R.'s apartment throughout this period. But none of the officers or the civilian witnesses offered any evidence on the question whether C.R. had said she did not plan to appear, or the reason why she might not appear.

This is a classic failure of proof. As shown in the petition for review, it stands in stark contrast to the state's clear, cogent, and convincing proof that Fallentine's wrongdoing caused Clark's absence in Fallentine. PRV at 13-14.[8]

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[8] The petition's discussion of Fallentine is quoted here:

> In Fallentine, Division One addressed forfeiture where the witness was still alive. The state charged Fallentine with arson, burglary, and possession of stolen property. An arson investigator reviewed surveillance videos and interrogated another suspect, Clark. In a recorded interview Clark ultimately admitted he set the fire, but at Fallentine's direction and encouragement. Fallentine, at 617-18.
>
> The state charged Clark with arson and he pled guilty. Charges against Fallentine were twice dismissed without prejudice

The state's and the trial court's contrary conclusion rises from a flawed presumption of waiver. The state and the trial court merely assumed C.R. did not cooperate and did not testify because she had been dissuaded by Dobbs' alleged conduct and threats. But

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while Clark's case was pending. After Clark was sentenced, the state refiled the charges against Fallentine. But even though Clark was granted immunity from further prosecution, he remained unwilling to testify against Fallentine. Fallentine, at 618.

To establish forfeiture, the state offered testimony from Clark's former social worker to show Fallentine's influence over Clark. She said Clark had low self esteem, was a "follower," did not want to return to foster care under any circumstances, and was motivated to have an ongoing relationship with his sister and Fallentine. After Clark's first interview with the arson investigator, the social worker said Clark told her Fallentine carried a firearm and was dangerous, Clark felt he could not get away from Fallentine, and was worried what would happen if Fallentine found him. Fallentine, at 621-22.

After Clark's second recorded interview with the investigator, he appeared "frightened, hypervigilent, and somewhat paranoid." The social worker found Clark on the floor in a fetal position, sobbing. Clark repeatedly told the social worker he believed Fallentine had "put out a hit" on him with the Gypsy Joker motorcycle gang. Clark said he did not want to be labeled a snitch and that Fallentine said if Clark rolled on him Fallentine would have the Gypsy jokers put out a hit on Clark. Clark said he just wanted to do his time "and not have to look over my shoulder all the time." Fallentine, at 622-23.

Division One concluded that this evidence, viewed in the state's favor, showed that "Fallentine told Clark if Clark testified against him, he would be killed, and that threat actually prevented Clark from testifying." Fallentine, at 623.

assumptions are not proof.[9] This is particularly true where the analysis must start with a presumption against forfeiture.

The state's answer to Dobbs' petition inadvertently illustrates the problem. The answer points out that Dobbs' brief and petition suggest several other reasons why C.R. might have declined to testify, then criticizes these as merely "possible explanations[.]" ANS, at 13 (state's emphasis).

The state's criticism is unwarranted,[10] but the state is correct that Dobbs did not present evidence to show why C.R. was absent. Then again, neither did the state. Because the state bore the burden of production and persuasion, its "possible" explanation, based on assumed causation, is a failure of proof.[11]

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[9] See Doe v. Puget Sound Blood Center, 117 Wn.2d 772, 787, 819 P.2d 370 (1991) (the opinion of an expert based on an assumption is not evidence); Bell v. Haley, 437 F.Supp.2d 1278, 1290 (M.D.Ala. 2005) ("even an informed assumption is not evidence"); Cooper v. State, 648 S.W.2d 315, 316 (Tex.Crim.App. 1983); Black's Law Dictionary (7th Ed. 1999), at 124 ("assumption" is "[a] fact or statement taken for granted; a supposition"), at 1454 ("supposition" is "[a]n assumption that something is true, without proof of its veracity").

[10] These explanations are systemically common, not controversial. See notes 5-7, supra.

[11] It is not unfair to hold the state to its burden. Counsel for the state clearly was aware of Fallentine, and its example of how to prove these facts. RP 250-51.

By assuming the nexus between the alleged threats and C.R.'s absence, the state's claim also suffers a familiar logical fallacy: "post hoc ergo propter hoc" (after this therefore because of this). The logic is fallacious because it confuses coincidence with causation. Anica v. Wal-Mart Stores, Inc., 120 Wn. App. 481, 489, 84 P.3d 1231 (2004). This fallacy is not "highly probable" proof that C.R.'s absence was caused by any alleged wrongdoing by Dobbs.

Judge Van Deren's dissent properly recognized this "record lacks even a scintilla of evidence about why the witness actually chose not to attend trial." Dobbs, 167 Wn. App. at 920-21. Whatever appellate lawyers and judges might want to assume in our ivory towers, the truth is that our society spawns a wide spectrum of mutually manipulative, abusive, and violent relationships. Potential witnesses may refuse to testify for a variety of reasons. They may recant, they may have been lying when the initial allegations were made, or, perhaps, they may have been intimidated into not appearing in court. But when confrontation rights are at stake, the nexus between wrongful conduct and its effect cannot be assumed. The state must prove it.

This Court accordingly should hold the state failed to establish that C.R.'s absence was caused by Dobbs' alleged wrongdoing.

Because Dobbs did not forfeit his confrontation rights, the admission of C.R.'s unconfronted testimonial hearsay was constitutional error. The state has not argued the error is harmless. Where the trial court expressly relied on the otherwise inadmissible evidence to prove counts 1, 2, and 3,[12] the state cannot show the error is harmless beyond a reasonable doubt. The proper remedy is reversal and remand for a new trial. Jasper, 174 Wn.2d at 120.

2. THIS COURT SHOULD HOLD THAT INDEPENDENT RELIABILITY REQUIREMENTS OF THE EVIDENTIARY RULES ARE NOT FORFEITED WHENEVER CONFRONTATION RIGHTS ARE FORFEITED.[13]

The trial court admitted numerous testimonial statements that did not satisfy the reliability requirements of traditional hearsay rules. RP 256-85. The Court of Appeals majority affirmed, relying on a footnote in Fallentine wherein Fallentine had conceded that forfeiture of one forfeits the other. Dobbs, 167 Wn. App. at 916-17 (citing Fallentine, 149 Wn. App. at 623-24 n.34).

While some courts have held forfeiture of confrontation rights automatically precludes a hearsay objection, some courts have not.

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[12] RP 306-08.

[13] If this Court determines that the state failed to establish forfeiture by clear, cogent and convincing evidence, it need not address this issue.

See e.g., Vasquez v. People, 173 P.3d 1099, 1106 (Colo., 2007) ("the more prudent course is to require that the hearsay rules be satisfied separately"). Although reliability is no longer the touchstone of confrontation clause analysis after Crawford, reliability remains an important consideration of the evidence rules. State v. Byrd, 198 N.J. 319, 352-53, 967 A.2d 285 (2009); see also, United States v. Rouco, 765 F.2d 983, 994 (11th Cir., 1985) (examining the statement's trustworthiness before admitting it); United States v. Carlson, 547 F.2d 1346, 1354-55 (8th Cir. 1976) (same); People v. Giles, 40 Cal.4th 833, 152 P.3d 433, 446-47, 55 Cal.Rptr.3d 133 (2007) ("even if it is established that a defendant has forfeited his or her right of confrontation, the contested evidence is still governed by the rules of evidence; a trial court should still determine whether an unavailable witness's prior hearsay statement falls within a recognized hearsay exception and whether the probative value of the proffered evidence outweighs its prejudicial effect"), vacated on other grounds, 554 U.S. 353; Joshua Christensen, Beguiled by Giles: The Overlooked Duality of Forfeiture by Wrongdoing, 62 Ala. L. Rev. 645, 651 (2011) (discussing the distinction between confrontation and hearsay rules).

Based on this well-reasoned authority, and the arguments in Dobbs' opening brief (BOA at 24-26), this Court should hold the trial

court erred in admitting evidence that did not satisfy the reliability requirements of Washington's evidentiary rules. The correct remedy is to remand to determine whether the offered evidence would be admissible, and then to determine whether otherwise inadmissible evidence affected the court's findings of guilt.

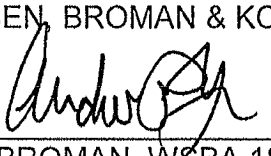
D. CONCLUSION

For the reasons set forth above, this Court should vacate Dobbs' convictions and remand for a new trial.

DATED this 10 day of December, 2012.

Respectfully Submitted,

NIELSEN, BROMAN & KOCH, PLLC.



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Supplemental Brief of Petitioner
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